

# **EXHIBIT 15**



June 5, 2017

**VIA FEDERAL EXPRESS**

Denise H. Houghton  
Office of General Counsel  
Johnson & Johnson  
One Johnson & Johnson Plaza  
New Brunswick, New Jersey 08933

**Re: Indemnification Demand Notice for Asbestos Lawsuits**

Dear Ms. Houghton:

I write to notify Johnson & Johnson; Johnson & Johnson Baby Products Company, a division of Johnson & Johnson Consumer Products, Inc.; and Johnson & Johnson Consumer Companies, Inc. (collectively "J&J") of Imerys Talc America, Inc.'s f/k/a Luzenac America, Inc. ("Imerys") of additional lawsuits filed against Imerys Talc America, Inc. in various jurisdictions alleging bodily injury as a result of exposure to asbestos and asbestos-containing body powders manufactured by J&J with talc delivered by Imerys or its successors or affiliates in accordance with the Agreements with J&J (the "Asbestos Lawsuits"). A list of the claimants is enclosed and copies of the 62 recent complaints can be located by visiting <https://highq.in/1aohb6qe7h>. The link will be valid until July 2, 2017

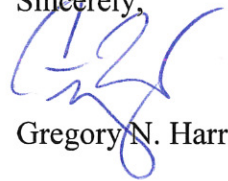
As set forth in Imerys' March 24, 2017 letter, which is incorporated herein, Imerys again demands indemnification for the Asbestos Lawsuits pursuant to various Agreements, as well as by operation of law. In light of the allegations contained in the Asbestos Lawsuits, J&J is obligated under the Agreements and/or principles of implied contract and/or implied indemnity to indemnify, defend, and hold harmless Imerys with respect to the liabilities resulting from the Asbestos Lawsuits including, but not limited to, legal defense costs and reasonable attorney fees incurred in defending the Asbestos Lawsuits.

Imerys reiterates its demand of March 24, 2017 that J&J (i) provide copies of all general liability and other insurance policies that may provide coverage for the Asbestos Lawsuits and (ii) cooperate with Imerys in its attempts to obtain coverage thereunder. As you may recall, the 1989 SPA provides that J&J "agrees to use its best efforts to make such coverage and policies (including excess coverage policies) available to Cyprus, Windsor and Western, and their affiliates, up to the limits specified in such policies, and to cooperate with Cyprus and its affiliates in making claims against such policies." (1989 SPA, §5.9.) As the successor in interest to Cyprus' rights under the 1989 SPA, we hereby assert our rights to such cooperation and such policies.

Denise H. Houghton  
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Please confirm in writing no later than ten (10) business days that J&J will comply with its indemnification obligations. Once I receive such confirmation, I will forward invoices for legal fees incurred to date for reimbursement and will continue to forward invoices for legal fees incurred by Imerys' counsel in defending ongoing or subsequent Asbestos Lawsuits.

Sincerely,



Gregory N. Harris

cc: Johnson & Johnson  
One Johnson & Johnson Plaza  
New Brunswick, New Jersey 08933  
Attn: General Counsel

Enclosure

Claimant	Jurisdiction
Alderdice, Gina and Andrew	NJ
Alne, Sandra and John	CA
Arend, Barbara	NJ
Arvelo, Donna	NJ
Axtell, Donald and Anita	IL
Barden, Douglas and Roslyn	NJ
Beran, Allyson and Minh Vo	NJ
Betancourt, Leah, et al.	IL
Black, Mary	NY
Brantley, Suzanne, et al.	IL
Bunkowske, Jill, et al.	IL
Chapman, Michelle and Richard	NJ
Colley, Marie	LA
Cope, Faith Belac, et al.	PA
Csontos, James	IL
Davis, Markesha	IL
DeAugustinis, Tara and Richard	NJ
Delacruz, Irene and Julius	CA
Dominguez, Francisco	CA
Doriot, Henri	DE
Dussia, Evan and Phyllis	IL
Ellis, Patricia	IN
Feddersen, Bruce	IL
Folkers, Shirley	IL
Garcia, Edward and Lisa	NJ
Germain, Michelle and Eddie	NY
Girard, Mark and Holly	IL
Goldsborough, Robert and Carol	IL
Grajeda, Teresa	IL
Gray, Jesse and Donna	IL
Harris, Bennie and Shiann	IL
Hayes, Donna Ann	KY
Heckenmueller, John and Charlotte	IL
Henry, Rosalind and Frederick	NJ
Herron, Frank	PA

Claimant	Jurisdiction
Hodjera, Matthew and Sylvia	WA
Huff, Linda and James	NJ
King, David, et al.	IL
Korettoff, Gail, et al.	CA
Ladue, Marc and Marsha	NJ
Linder, Marie	IL
Macy, Marie Bond and Jack	NJ
Margarum, Christine, et al.	IL
Martinez, Kayla	NJ
Michaels, Janet	IL
Mulcahey, Sandra	IL
Nadeau, Helen and Ronald	IL
Nealon, Linda	IL
Nell, Paul and Karen	IL
Niemeyer, Shirley	NY
Owens, Cora Belle and Jerry	SC
Payne, Edward	IL
Pollakov, Ruth and Ronald	IL
Prokocimer, Lois	NY
Provinzano, Holli and Ryan	NJ
Ratcliff, Jody E.	WA
Rice, Bonnie, et al.	MO
Rimondi, Ricardo and Pilar	NJ
Ruman, Joanna and Jacenty	NJ
Sabath, Frederick	IL
Sausser, David	OH
Schock, Dolores	IL
Serata, Samuel J.	NJ
Shea, Joseph and Linda	IL
Stenhouse, Gertrude and Ruben	MO
Stevenson, Susan, et al.	FL
Tomlinson, Raymond and Emma	IL
Trimble, Linda (et al.)	IL
Van Dyke, April, et al.	IL
Viola, William and Mary	NJ
Weirick, Carolyn	CA

Claimant	Jurisdiction
Welton, Thomas and Patricia	IL
Willis, Barbara and Russell	IL
Wittman, Barbara and John	CA
Wylie, Veronica	SC
Zoas, Ann and Christos	IL

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